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Attorneys for Defendants
**PAR TECHNOLOGY CORPORATION and
ROME RESEARCH CORPORATION**

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

ALBERTO D. ESPAYOS, et al.,) CASE NO. 1:12CV-00017
Plaintiffs,)
v.)
PAR TECHNOLOGY) DEFENDANTS PAR TECHNOLOGY
CORPORATION, a Delaware) CORPORATION AND ROME
corporation and ROME RESEARCH) RESEARCH CORPORATION'S
CORPORATION, a New York) MOTION FOR SUMMARY JUDGMENT
corporation,) AGAINST PLAINTIFF ALEXANDER U.
) IGISAIAR; MEMORANDUM IN
Defendants.) SUPPORT OF MOTION FOR
) SUMMARY JUDGMENT;
) DECLARATION OF ANNE T.
) HORIUCHI; EXHIBITS "A" – "B";
) DECLARATION OF EDWARD R.
) WILLIAMS; DECLARATION OF
) TIMOTHY W. HIGGINS; PROOF OF
) SERVICE
)
)
Hearing:

Hearing:

1) **Date: December 5, 2013**
2) **Time: 10:00 a.m.**
3)
4) **Trial Date: March 3, 2014**
5) **Hon. Ramona V. Manglona**
6)

7 Defendants PAR TECHNOLOGY CORPORATION and ROME RESEARCH
8 CORPORATION (“Defendants”) by and through their attorneys Goodsill Anderson Quinn & Stifel
9 LLP and O’Connor Berman Dotts and Banes, respectfully move this Court for an order granting
10 judgment in favor of Defendants and against Plaintiff Alexander U. Igisaiar on all claims asserted in
11 Plaintiff’s First Amended Complaint on the grounds that there are no genuine issues of material fact
12 and that Defendants are entitled to judgment as a matter of law.

14 This motion is brought pursuant to Rules 7 and 56 of the Federal Rules of Civil Procedure
15 and Rule 7.1 of the Local Rules of Practice for the United States District Court for the Northern
16 Mariana Islands, and is supported by the Memorandum in Support of Motion, Declarations and
17 Exhibits attached hereto, the records and files herein, and such further evidence and argument as
18 may be offered in support of this Motion.

20 Dated this 1st day of November, 2013.

21 By: /s/ Anne T. Horiuchi
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